

Remarks

Claims 1-6 and 19-24 are pending in this application. The examiner has rejected each of these claims as being anticipated under 35 U.S.C. 102(b) by *White Paper-Catalyst 8500 Architecture, Cisco*, pages 1-19, 1998 (hereinafter "*Cisco White Paper*").

A. Independent Claims 1 and 19

Following the above amendments, the pending independent claims of the present application are claims 1 and 19. Independent claims 1 and 19 have been rejected as being anticipated by the *Cisco White Paper*. This response will explain the standard for anticipation rejections under Section 102, the differences between the *Cisco White Paper* and the present invention, and the specific elements of the independent claims of the present application that are not disclosed in the *Cisco White Paper*.

1. The Anticipation Standard

A claim is not anticipated unless each element of the claim is found in a single prior art reference. Manual of Patent Examining Procedure 2131. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Id. quoting Verdegall Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631 (1987). With respect to independent claims 1 and 19 of the present invention, each and every element of these claims is not present in the *Cisco White Paper*.

2. The *Cisco White Paper* and the Present Invention

Applicants respectfully submit that the *Cisco White Paper* does not anticipate Applicants' invention. Applicants have amended independent claims 1 and 19 to specify that the module of each claim "comprises at least a portion of the switching fabric" of the switch. Amended claims 1 and 19 are directed to a module comprising "one or more module routing

components operable to communicatively couple the devices when the module is received” by the switch. In addition, each of claims 1 and 19 specifies that the “module comprises at least a portion of the switching fabric.” As such, the claimed module of each of claims 1 and 19 includes routing components that provide the interconnection points within a switch that define the switch’s switching fabric. The switching fabric communicatively couples the devices in the network.

In the examiner’s rejections of claims 1 and 19, the examiner cites two modules disclosed in the *Cisco White Paper*: a CEFA module and an SRP module. However, these modules do not communicatively couple the devices connected to the switch nor comprise any portion of the switch’s switching fabric. The CEFA module is discussed and illustrated on page 7 of the *Cisco White Paper*. It is shown to be responsible for the Ethernet MAC layer functions, the address or network lookup in the CAM table, and the forwarding of packets with its correct rewrite information to the Fabric Interface (right column page 7).

Figure 5 Catalyst 8500 Line Card Architecture

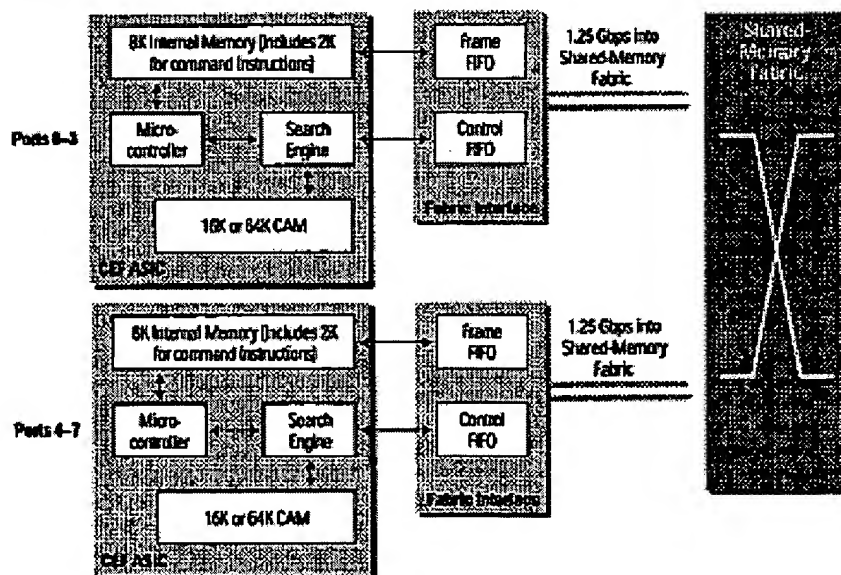


Figure 5 from page 7 of the *Cisco White Paper*

Figure 5 on page 7 of the *Cisco White Paper* is reproduced above. It shows that the CEFA is a part of a line card that includes ports for devices to connect to the switch. Figure 5 also illustrates that the line cards are separate and distinct from the “shared memory fabric” or switching fabric of the switch. The *Cisco White Paper* explains that the CEFA forms a part of the mechanism for receiving packet based communications from the devices to send to a fabric interface (right column page 7). In no way are the CEFAs described or illustrated as responsible for communicatively coupling the devices either by themselves or as a portion of the switch fabric. Instead, the CEFA modules are depicted as components of a separate and distinct network interface card, common to ordinary computer systems, but adapted for use in this Cisco switch. In sum, the CEFA modules are not operable to communicatively couple devices to the network and do not comprise any portion of the switching fabric.

The examiner also identifies the SRP module disclosed in the *Cisco White Paper* as disclosing the modules of claims 1 and 19. The SRP module is discussed in detail on page 2 of the *Cisco White Paper*:

The Switch Route Processor module provides the intelligence to the Catalyst 8510, interfacing to each port via the switch fabric. The SRP module runs the Cisco IOS software for high-speed, Layer 3 switching, including the Cisco Express Forwarding table, routing protocol control, and dynamic multicast. Also supported on the SRP module are the Simple Network Protocol (SNMP) management agent and the many Management Information Bases (MIBs) used for the management of the device, as well as in the future, integrated management applications for advanced traffic management. *Cisco White Paper*, page 2.

The SRP module therefore performs the processing function for the switch. It *does not* form a portion of the switch fabric. Instead, the SRP module is separate and distinct. As a result, the SRP module is described as “interfacing to each port *via the switch fabric*.” This description

plainly demonstrates that the SRP module of the *Cisco White Paper* does not form any portion of the switch fabric. Finally, nowhere is the SRP module shown or described to communicatively couple the devices connected to the switch or to form a portion of the switch fabric as Applicants' invention directs.

Therefore, neither the CEFA module nor the SRP module communicatively couple devices attached to a computer network. The *Cisco White Paper* also does not teach that either module forms a portion of the switch's switch fabric. Applicants respectfully request that the rejection of claims 1 and 19 be withdrawn.

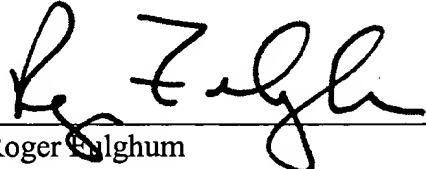
B. Dependent claims 2-6 and 20-24

Dependent claims 2-6 and 20-24 will not be discussed individually herein, as each of these claims depends, either directly or indirectly, from an otherwise allowable base claim.

Conclusion

The applicants respectfully submit that pending claims 1-6 and 19-24 of the present invention are allowable. The applicants respectfully request that these claims be passed to issuance.

Respectfully submitted,



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